

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**SCOTT TURNAGE , CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON,
ISSACCA POWELL, KEITH BURGESS, TRAVIS
BOYD, TERRENCE DRAIN, and KIMBERLY
ALLEN on behalf of themselves and all similarly
situated persons,**

Plaintiffs,

V.

BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity as former Jail Director of Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; REGINALD HUBBARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC., a foreign corporation; SIERRA-CEDAR, INC., a foreign corporation, SIERRA SYSTEMS GROUP, INC., a foreign corporation; and TETRUS CORP, a foreign corporation

Defendants.

**REPLY IN SUPPORT OF DEFENDANTS' MOTION REQUESTING APPROVAL OF
PROPOSED THIRD AMENDED SCHEDULING ORDER**

Come now all Defendants in this action and submit the following Reply in Support of their Motion Requesting Approval of Proposed Third Amended Scheduling Order (“Motion to Amend Scheduling Order”) (Dkt. 288) as follows:

In the initial Scheduling Order entered in February 2017 and the two subsequent Amended Scheduling Orders entered in this cause, the parties have agreed and the Court has ordered the bifurcation of class discovery from merits discovery. On March 2, 2020, Defendants filed a Motion to Amend the Scheduling Order to amend deadlines in the existing Scheduling Order. This is a very short motion based on similar motions filed in the past to amend previous Scheduling Orders in this class action matter. In their Response to the Motion to Amend Scheduling Order (Dkt. 293), Plaintiffs do not oppose the new deadlines proposed by Defendants, but they do oppose the request to continue to bifurcate class and merits discovery.

Similarly, on March 5, 2020, Plaintiffs filed a Motion for Discovery Conference to Permit Merits-Based Discovery, to Compel Depositions and for Sanctions and Fees (“Motion For Discovery Conference”) (Dkt. 291), which, among other things, sets out virtually the same bifurcation arguments, and requests to reverse the bifurcation of discovery agreed by the parties throughout this litigation. Defendants are preparing responses to Plaintiffs’ Motion for Discovery Conference, which are due to be filed on Thursday, March 26, 2020. Because Defendants’ arguments in opposition to Plaintiffs’ bifurcation arguments in Plaintiffs’ Response to the Motion to Amend Scheduling Order are the same as Defendants’ arguments in their soon-to-be-filed Responses to Plaintiffs’ Motion for Discovery Conference, Defendants hereby incorporate the arguments in their Responses to Plaintiffs’ Motion for Discovery Conference to be filed March 26, 2020, as if those arguments were stated verbatim herein. There is no reason

to duplicate those arguments, but Defendants simply incorporate them herein.¹

WHEREFORE PREMISES CONSIDERED, Defendants respectfully request that their Motion Requesting Approval of Proposed Third Amended Scheduling Order be granted.

Dated: March __, 2020

Respectfully submitted,

s/ Bradley E. Trammell
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¹ The Motion to Amend Scheduling Order was filed prior to the appreciation of the wide-ranging effects of the COVID-19 pandemic. Because of the social distancing norms and executive orders issued, it may be necessary at a later date for the parties to request additional extensions to the Scheduling Order deadlines.

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on March __, 2020, a true and correct copy of the foregoing document was forwarded via the Court's ECF system and/or by email to:

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